

Magistrate Judge S. Kate Vaughan

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

BRADLEY WHALEY,

Defendant.

CASE NO. MJ25-157

COMPLAINT for VIOLATION

18 U.S.C. Section 875(c)

BEFORE S. Kate Vaughan, United States Magistrate Judge, U. S. Courthouse,
Seattle, Washington.

The undersigned complainant being duly sworn states:

COUNT ONE

Interstate Communication of a Threat

On or about March 20, 2025, in the Western District of Washington, BRADLEY WHALEY knowingly and willfully did transmit in interstate and foreign commerce, via telephone call from Tukwila, Washington to Washington, D.C., a threat to injure a member of the United States Congress, namely U.S. Representative 1. More specifically, in that telephone call, WHALEY stated, in part, "I am going to go there [to U.S.

1 Representative 1's Congressional District Office location in Washington state] and slit
2 [his/her] throat and slit [his/her] staff's throat."

3 All in violation of Title 18, United States Code 875(c).

4 And the complainant states that this Complaint is based on the following
5 information:

6 I, Jesse Cole, being first duly sworn on oath, depose and say:

7 **AGENT TRAINING AND EXPERIENCE**

8 1. I am employed as a Special Agent with the United States Capitol Police
9 (USCP). I have been so employed since 2018. I am currently assigned to the USCP
10 Investigations Division, Threat Assessment Section. In the context of my employment
11 with USCP, I have completed hundreds of hours of training in numerous areas of law
12 enforcement investigations and techniques. I have also received training regarding the
13 application for and execution of both search and arrest warrants. I have received training
14 in assessing and managing individuals who have communicated threats and engaged in
15 behaviors associated with targeted violence. In my current assignment, I have
16 participated in and conducted numerous investigations involving stalking, harassment and
17 threatening communications, both locally and interstate.

18 2. As a Special Agent, I am an "investigative or law enforcement officer of
19 the United States," within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the
20 United States empowered by law to conduct investigations of and to make arrests for
21 offenses enumerated in Title 18 of the U.S. Code.

22 3. The facts and information contained in this Complaint are based upon my
23 personal knowledge of the investigation and information obtained from other state and
24 federal law enforcement officers. All observations not personally made by me were
25 relayed to me by the individuals who made them or are based on my review of reports,
26 documents, and other physical evidence obtained during the course of this investigation. I
27 have not included in this criminal complaint every fact known to me or to other law

enforcement officers surrounding this investigation. Rather, I have included only those facts necessary to establish probable cause that BRADLEY WHALEY committed the offense alleged in this Complaint.

SUMMARY OF PROBABLE CAUSE
WHALEY's Telephonic Threat to the D.C. Congressional Office
for U.S. Representative 1 on March 20, 2025

4. On March 20, 2025, Congressional Staff Person 1 was working as an intern in the Washington, D.C. Congressional Office of U.S. Representative 1. Shortly before 2:00 PM PDT, the D.C. Congressional Office for U.S. Representative 1 received a call, and Congressional Staff Person 1 answered the phone. During that call, Congressional Staff Person 1 immediately recognized the caller's voice to be WHALEY from previous calls and voicemails, which are described further below.

5. During this call, WHALEY asked Congressional Staff Person 1 if he could speak to U.S. Representative 1. Congressional Staff Person 1 informed WHALEY that U.S. Representative 1 was not in the office. WHALEY then stated something to the effect of, "[he/she] is in [U.S. Representative 1's Congressional District Office location in the state of Washington]?"¹ Congressional Staff Person 1 replied that [he/she] did not know where U.S. Representative 1 was, but that [he/she] was not in the District of Columbia. WHALEY then stated, "oh well if [he/she] is in [U.S. Representative 1's Congressional District Office location in the state of Washington] I am going to go there and slit [his/her] throat and slit [his/her] staff's throat." WHALEY then paused for a few seconds and stated, "yeah it's two pm, I still have plenty of time to do that." Congressional Staff Person 1 asked WHALEY for his name. At first, he stated, "no I don't have to fucking give that to you," but then he stated his name was "Brad Whaley." Immediately following the call, Congressional Staff Person 1 wrote down WHALEY's statements on a form along with additional information about the call. According to that report, WHALEY

¹ U.S. Representative 1's pronouns and District Office location have been redacted to protect their identity.

1 called from a telephone number with the last four digits of 1016 (hereafter, x1016). The
2 report also reflected the caller was a male, had an aggravated tone, spoke with a
3 midwestern accent, made the threatening statement quoted above, and that the call lasted
4 about 45 seconds.

5 6. While WHALEY was on the phone, Congressional Staff Person 1 looked
6 down and saw WHALEY's phone number displayed on [his/her] desk telephone.
7 Congressional Staff Person 1 took a photograph of [his/her] desk telephone screen that
8 clearly captured WHALEY's telephone number, x1016.

9 7. Congressional Staff Person 1 knew x1016 to be WHALEY's phone
10 number, based upon previous telephone conversations [he/she] had with WHALEY, in
11 which WHALEY also called from x1016. During those previous telephone conversations,
12 WHALEY had introduced himself to Congressional Staff Person 1 by his full name.
13 Additionally, as discussed further below, the Washington, D.C. Office of U.S.
14 Representative 1 has received voicemails from WHALEY, and in those voicemails,
15 WHALEY has stated his full name and provided the phone number x1016.

16 8. An open-source search of phone number x1016 revealed that T-Mobile was
17 the service provider. According to records obtained from T-Mobile, the number x1016
18 placed a call to the Washington, D.C. Office of U.S. Representative 1 on March 20, 2025,
19 at 1:43 PM PDT. This call made initial cell tower connection at a cell tower located in
20 Tukwila, Washington, indicating the call was made from that area. The date and time of
21 this call are consistent with the date and time of the threatening call received and reported
22 by Congressional Staff Person 1.

23 9. The records obtained from T-Mobile reflect the listed subscriber of x1016
24 is Amy Whaley. The listed subscriber address is 20299 Gardner Ct, Burlington,
25 Washington 98233. Open-source searches reflect this is a former address of BRADLEY
26 WHALEY. Investigators believe Amy Whaley is likely BRADLEY WHALEY's spouse
27 or relative.

**Other Recent Communications WHALEY has Made
to the D.C. Congressional Office for U.S. Representative 1**

10. According to Congressional Staff Person 1, WHALEY had also called the D.C. Congressional Office for U.S. Representative 1 a week earlier, on March 13, 2025. from x1016. Congressional Staff Person 1 reported that during the call WHALEY had stated, "I am going to drive to D.C., kick down your door, and fuck [U.S. Representative 1] and everyone in [his/her] office up and I'll do the same to [another U.S. Representative] and [his/her] people." Congressional Staff Person 1 immediately documented these statements on a report. According to Congressional Staff Person 1, that report was [his/her] fourth report written about WHALEY's calls.

11. According to Congressional Staff Person 1, the D.C. Congressional Office for U.S. Representative 1 has also received voicemails from WHALEY.

12. For example, on March 15, 2025 at about 7:30 PM PDT, they received a voicemail in which WHALEY called from x1016 and stated: "Apparently, I don't have enough time under one god damn day to tell you what to think...what I...what I think about you as a fucking human being. You are a [man/woman], motherfucker. If I f I lose one day, I if miss one day of social security, you and I are gonna see a face-to-face right away motherfucker. You are a fucking moron, and I can't help the fact that you're a fucking moron. So just, If my social security is delayed by one fucking day, you and I are going to have a face-to-face and it's not gonna be pretty. Remember, I have a second amendment right to form a militia to take out motherfuckers like you. Is that a threat? God damn right it's a threat, you motherfucker!"

13. And again, on March 18, 2025 at around 3:00 PM PDT, the D.C. Office of U.S. Representative 1 received a voicemail in which WHALEY called from x1016 and stated: "Yes, this is Brad Whaley again. [WHALEY then provided phone number x1016] Tell [U.S. Representative 1] to quit being a fucking Munich coward. Grow a pair of balls and call me. He needs to call me because he doesn't have a reason to be scared about

1 Donald Trump. He's just, Donald Trump is just a fucking moron. But he needs to be
2 scared of us. We're in Washington. We will take his ass out. So call me now. [Again,
3 WHALEY provided phone number x1016] Don't be a fucking pussy. Republicans are
4 nothing but snowflake pussies right now and you gotta quit doing that. Be a man bitch.
5 And call me."

6 **WHALEY'S Arrest in Seattle, Washington**

7 14. On March 21, 2025 at approximately 2:39 PM PDT, WHALEY was
8 arrested in Seattle, Washington on probable cause he committed the above-identified
9 offense. Using active location data for x1016 that was being provided by T-Mobile,
10 agents were able to locate WHALEY in downtown Seattle at his place of employment
11 and arrest him outside.

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CONCLUSION

15. Based on the above facts, I respectfully submit there is probable cause to believe that BRADLEY WHALEY did knowingly and intentionally transmit in interstate and foreign commerce, via telephone on March 20, 2025, from Tukwila, Washington to Washington, D.C., a threat to injure U.S. Representative 1, in violation of Title 18, United States Code, Section 875(c).

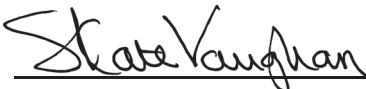
16. This Complaint and affidavit are being presented via reliable electronic means pursuant to Fed R. Crim. P. 4.1 & 41(d)(3).

Cole, Jesse R. Digitally signed by Cole, Jesse R.
Date: 2025.03.21 22:30:12 -04'00'

Jesse Cole, Complainant
Special Agent, United States Capitol Police

The above-named agent provided a sworn statement attesting to the truth of the contents of the foregoing affidavit by telephone. Based on the Complaint and Affidavit sworn to before me, the Court hereby finds that there is probable cause to believe the Defendant committed the offense set forth in the Complaint.

Dated this 21st day of March, 2025.


S. KATE VAUGHAN
United States Magistrate Judge